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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

Docket #

-----X  
99 SECOND REALTY, LLC

Plaintiffs

**NOTICE OF REMOVAL  
BY DEFENDANTS**

v.

1. 187 PINE STREET ASSOCIATES, LLC
2. AJIT BAINS
3. DALJIT BAINS

JOHN DOE "1" through "JOHN DOE "10"  
both inclusive; Defendants JOHN DOE ""1"  
through JOHN DOE "10" regardless of  
number being each a separate Defendant and  
being fictitious and unknown to the Plaintiff  
the persons or parties intended being the tenants,  
occupants, persons or corporations, if any,  
having or claiming an interest in or lien upon  
the premises described in the complaint;

Defendant(s)

-----X

Defendants 187 Pine Street Associates, LLC, Ajit Bains and Daljit Bains file this Notice of Removal pursuant to 28 U.S.C. §1441, et. seq., to remove this case, filed by plaintiff, 99 Second Realty, LLC (hereinafter “99 Second”), from the Superior Court of the State of New Jersey, County of Hudson to the United States District Court for the District of New Jersey.

As grounds for removal and for no other purpose, defendants state as follows:

1. Defendants desire to exercise their rights under the provisions of 28 U.S.C. U.S.C. §1441, et. seq., to remove this case from the Superior Court of the State of New Jersey, County of Hudson where this action is now pending.

2. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders served upon defendants in the state court action are attached hereto as Exhibit A.
3. Plaintiff's summons and complaint was served on defendants on or about August 27, 2020.
4. The district courts of the United States have original jurisdiction of all civil actions where the matter in controversy exceeds the sum of \$75,000, exclusive of interest and costs, as between citizens of different states. 28 U.S.C. § 1332(a) (1).
5. Plaintiff's complaint states that plaintiff's principal place of business is at 377 Park Avenue South, 8th Floor, New York, NY 10016. Plaintiff was and remains a citizen of the State of New York.
6. Plaintiff's complaint states that defendant 187 Pine Street Associates, LLC is a New Jersey Limited Liability Corporation, with its principal place of business at 104 Aspen Drive, West Windsor, NJ 08550 and the individual defendants' principal place of residence is also New Jersey. Specifically defendant Ajit Bains and Daljit Bains's principal place of residence is 104 Aspen Drive, West Windsor, NJ 08550.
7. As such, there was and there remains complete diversity of citizenship between plaintiff and defendants.
8. Plaintiff's complaint asserts claims against defendants for breach of contract and foreclosure of a real property located at
9. Plaintiff's complaint alleges more than \$821,299 in damages pursuant to the various causes of actions.

10. As the matter in controversy exceeds \$75,000.00 and all of the defendants are a citizen of a state different than the sole plaintiff, this Court has diversity jurisdiction under 28 U.S.C. § 1332(a) (1).
11. Pursuant to the provisions of 28 U.S.C. § 1441 et seq., the right now exists to remove this case from the Superior Court of the State of New Jersey, County of Hudson, to the United States District Court for the District of New Jersey.
12. Written notice of the filing of this Notice of Removal has been given to all adverse parties as required by law.
13. A true and correct copy of this Notice of Removal has been filed with the Clerk of the Superior Court of the State of New Jersey, County of Hudson, as required by law.

WHEREFORE, defendants request that this matter now pending in the Superior Court of the State of New Jersey, County of Hudson be removed to this Court.

Dated: New York, New York  
October 1, 2020

/s/ Vivek Suri  
VIVEK SURI, ESQ.

To: Feldman & Associates, LLP  
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

Vivek Suri, an attorney admitted to practice before this Court, solemnly affirms that he has filed a copy of (a) Notice of Removal by Defendants with Civil Cover Sheet, and (b) this affirmation of service with the Clerk's Office of the District of New Jersey. Additionally copies of the foregoing documents were served upon the counsel for the plaintiff, today at the following address:

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Attorneys for Plaintiff

Dated: New York, New York  
October 1, 2020

/s/ Vivek Suri  
VIVEK SURI, ESQ.